

## REMARKS

Responses to the several comments, objections and rejections set forth in the pending Office Action are individually set forth below.

### Claim Rejections – 35 U.S.C. §102(b)

Claims 1-9 and 16-21 stand rejected under 35 U.S.C. §102(b) over U.S. patent no. 5,486,687 ("Le Roux"). This rejection is respectfully traversed. It is submitted that both of the independent claims 1 and 16 of this group are novel over the Le Roux reference, and thus that each of their dependent claims 2-9 and 17-21 is similarly novel. In addition, several of the dependent claims specify additional novel features.

Claim 1 defines an electronic card having a physical shape and arrangement of electrical contacts according to one published card standard, while the electrical interface through the contacts conforms to a different published card standard. The two card standards are further recited to have incompatible physical card shapes, arrangements of contacts and electrical signal interfaces. The Le Roux reference does not suggest such a card.

The memory card 10 of Le Roux is described to follow one standard. The PCMCIA standard is mentioned (col. 1, lns. 25-30; col. 4, lns. 24-27). The credit (security) card 18 is described to follow another standard. The ISO 7816 (col. 3, lns. 25-30) or the G.S.M. (col. 6, lns. 3-6) standards are mentioned for different embodiments. What is not suggested by Le Roux is the claimed card that has a physical shape and electrical contacts according to one of those standards but with an electrical signal interface *through the contacts of that same card* that follows another one of the standards. That is, Le Roux describes several cards according to different standards that can be used but does not suggest a single card that mixes, from different standards, the physical shape, the electrical contact arrangement and the electrical signal interface.

Le Roux does describe the combined use of two cards according to different standards within a single personal computer card slot. Both the credit (security) card 18 and the memory card 10 of Figure 1, for example, are connected together to a personal computer through a common card slot. But nothing is suggested in Le Roux other than making each of these cards totally in accordance with a different card standard: each has a physical shape, arrangement of electrical contacts and electrical signal interface through the contacts that follow a single standard. There is no mixing of features from different standards within one card, as is claimed.

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The fact that the credit (security) card 18 communicates its data through the memory card 10 with the host personal computer does require that the communications standard followed by the memory card 10 be changed in order to do so, and nothing in Le Roux suggests such a change. The card 10 still has the same physical shape, arrangement of contacts and electrical signal interface through its contacts 12 according to a single standard, in this case the PCMCIA standard. The addition of an electrical interface between the two cards 10 and 18 is not disclosed to require any change in the electrical interface standard of the card 10 through its connector 12. Le Roux describes the contents of the credit (security) card 18 being communicated through the card 10 but this does not require that the electrical signal interface of the memory card 10 be changed from that of the PCMCIA standard to that of the ISO 7816 standard used by the credit card 18. The two cards likely communicate with each other according to the ISO 7816 standard but this does not affect the way that the memory card 10 interfaces through its connector 12 with the host personal computer.

There are also additional novel features expressed in claims 2-6 that are dependent upon claim 1. Nothing is mentioned in the cited Le Roux reference about the either of the MMC or SD card standards recited in each of claims 2-6. Claims 5 and 6 also recite that the electrical signal interface is presented at the card contacts according to *both of the first and second card standards*, something not even remotely considered by Le Roux. Claims 4 and 6 specify that a security code stored in the card is accessible through the card contacts according to the electrical interface of the second card standard while the card shape and contacts conform to the first card standard. The cited Le Roux reference, on the other hand, accesses the security code of the credit card 18 through the contacts 12 of the memory card 10 according to the PCMCIA standard to which the memory card 10 follows in all respects. Le Roux does not access the security code stored in the credit card 18 through the connector 12 of the PCMCIA memory card 10 according to the different ISO 7816 electrical signal interface standard.

Independent claim 7 includes the same features as claim 1 and more but in method form. As discussed above with respect to claim 1, Le Roux does not suggest the claimed "second card." The second card is defined to have a physical shape and arrangement of electrical contacts according to a first card standard but an electrical interface through the contacts according to a second card standard. Further, the claimed method contemplates using this second card with a different first card in the same "at least one receptacle." Le Roux, on the other hand, does not suggest that both of the memory card 10 and credit card 18

are connectable to the card reader connector 24. Indeed, the credit card 18 of Le Roux could not be received by the connector 24 because of its much different contact structure.

Independent claim 16, as amended, defines the same subject matter as claim 1 but with different terms and in a different scope, and is submitted to be novel over the cited Le Roux reference for the same reasons as given above. Further, its dependent claims recite the same additional features as claims 2-6 discussed above, so a repeat of that discussion is avoided.

Claims 22 and 23 stand rejected under 35 U.S.C. §102(b) over U.S. patent no. 6,002,605 ("Iwasaki"). It should first be noted that section 102(b) is an inappropriate basis for the rejection since Iwasaki was published in October 24, 2000, after the filing of the present application. Section 102(e) appears to be a more appropriate basis for the rejection. In any case, claim 22 is being amended to make clear that the security code and data receiving circuits are connected with a single card receptacle, although there may certainly be more than one such receptacle in a system. The embodiment 2 of the Iwasaki patent, referenced in the Office Action, on the other hand, utilizes separate receptacles to receive the security and data cards (see Figures 14A and 14B).

Accordingly, reconsideration of the rejections of claims 1-9 and 16-21 as being anticipated by the cited prior art is respectfully requested.

#### Claim Rejections – 35 U.S.C. §103

Independent claim 10, its dependent claims 11 – 15, and independent claim 24 all stand rejected under 35 U.S.C. §103(a) over a combination of Le Roux, U.S. patent no. 5,278,395 ("Benezet") and Iwasaki. Le Roux is said in the Office Action to fail to suggest removing the first card (containing the security code) from the receptacle and then inserting the second card (containing operating data) into the same receptacle. In fact, Le Roux teaches away from doing this because the credit card 18 is connected to the memory card 10 while the memory card 10 is being utilized. The thrust of Le Roux is the physical and electrical connection between the two cards. There is thus no need to insert the credit card 18 into the same receptacle as the memory card. In light of this clear teaching by Le Roux of such a contrary approach, it would take practically an express suggestion that this specific approach be totally reversed in order to render claims 10 – 15 and 24 obvious. The cited Benezet patent does not provide such a suggestion. No motivation is apparent from Benezet as to why one of ordinary skill would have wanted to make such a drastic change in the system of Le Roux. Although Benezet uses two cards in a common receptacle at different times, nothing has been

found that would have suggested the total reconfiguration of Le Roux to use its two cards in that manner; a manner that is totally incompatible with Le Roux's disclosure.

Dependent claims 11 and 12 add that the data stored in one of the cards is audio data, for which the third patent of Iwasaki is cited as rendering obvious. But none of the three cited references suggests the overall combination of a security card and audio data card that are both received by a system receptacle, wherein the security card is first inserted to enable the system to utilize the audio data on the second card.

Dependent claim 13 and independent claim 24 each specify that the system in which the receptacle resides is a vehicle sound system. The Office Action appears to take Official Notice that it would have been obvious to modify the combination of three cited references to provide such a system in a vehicle. No allegation is made in the Office Action that any of the three cited references suggest this limitation. Objection is hereby made to the taking of Official Notice of such a "fact" without supplying suitable evidence of it. No *prima facie* case of the obviousness of either of claims 13 or 24 has been made.

Dependent claim 14 recites that the system is a global positioning system (GPS). No allegation is made in the Office Action that any of the three references suggest this use of the system. No *prima facie* case of the obviousness of claim 14 has been made.

#### Claim Objections

All of the objections to the claims that were made have been carefully reviewed. It is appreciated that some of these matters were raised, and appropriate claim amendments are being made. But it is submitted that others of the objections are not well taken, so no corrective action is being taken with respect to them. It is noted that the claims have not been rejected on these grounds.

One change that has not been made is to replace "the card" with "the electronic card." It is submitted that the modifier "electronic" need not be included in order to have a proper antecedent. Also, the term "omits" has not been changed. Claims 3 and 18 are submitted to be quite definite.

#### Information Disclosure Statement

A Supplemental Information Disclosure Statement is being filed herewith, with copies of the references cited. Consideration and making these references of record in the file of the present application are requested.

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The treatment in the Office Action of a previously filed Information Disclosure Statement is disappointing. The Statement itself (filed October 24, 2000, according to the return postcard) says that copies of the references are included. The return postcard, which the PTO stamped and returned, is clearly marked "(w/14 refs)". Yet the Office Action concludes that copies of the references were not filed. The experience of the undersigned attorney is that copies of references occasionally become separated from such Statements within the PTO. If the Examiner does not find copies of all the references with the Statement being filed with this Amendment, it is requested that undersigned attorney be contacted by telephone in order to arrange a prompt personal delivery of any that might not reach him.


Conclusion

For the reasons stated above, it is believed that the present application is in condition for allowance, and an early indication of its allowance is solicited.

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LABEL NO:**

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Respectfully submitted,



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Reg. No. 24,486

Dec. 14, 2001  
Date

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## DETAILS OF AMENDMENTS BEING MADE TO THE CLAIMS

1. An electronic card that is removably insertable into a receptacle which makes electrical contact with contacts on the card, wherein a physical shape of the card and an arrangement of the contacts conform with a first published card standard, while an electrical interface through the contacts conforms to a second published card standard, the first and second card standards specifying incompatible physical card shapes, arrangements of contacts and electrical signal interfaces.

2. The card according to claim 1, wherein the first card standard is that of the MMC or SD Card, while the second card standard is an ISO/IEC 7816 standard.

3. (Amended) The card according to claim 2, wherein the card omits having ~~the~~an electrical signal interface at ~~its~~ said contacts according to the first card standard.

4. The card according to claim 3, wherein data of a security code is stored in the card in a manner to be accessible through the card contacts according to the electrical interface of the second card standard.

5. (Amended) The card according to claim 2, wherein the card additionally includes ~~the~~an electrical signal interface at ~~its~~ said contacts according to the first card standard.

6. The card according to claim 5, wherein the card includes data stored therein of a security code that is accessible through the card contacts according to the electrical interface of the second card standard, and additionally includes content data stored therein that is accessible through the card contacts according to the electrical interface of the first card standard, wherein the security code is adapted for use in enabling utilization of the content data.

7. A method using removable data memory cards, comprising:  
providing a first card having a physical shape, arrangement of electrical contacts and an electrical interface through the contacts according to a first published card standard,

providing a second card having a physical shape and an arrangement of electrical contacts according to the first card standard and an electrical interface through the contacts according to a second published card standard, wherein the first and second card standards specify incompatible physical card shapes, arrangements of contacts and electrical signal interfaces,

inserting the first and second cards into at least one receptacle that electrically engages their contacts according to the arrangement of electrical contacts of the first card standard,

reading data stored in the first and second cards through a system electrically connected with the receptacle, and

utilizing the data read from the first and second cards by the system in a cooperative manner.

8. The method according to claim 7, wherein the data stored in the second card is a security code that is utilized by the system to enable utilization of data read from the first card.

9. The method according to either of claims 7 or 8, wherein the first card standard is of either the MMC or SD Card, and the second card standard is an ISO/IEC 7816 standard.

10. A method of operating an electronic device, comprising:

inputting a security code to the electronic device by inserting a first non-volatile memory card into a receptacle of the device on which the security code is stored,

comparing the inputted security code with a security code stored in a non-volatile manner within the device, and, if the security codes compare, enabling operation of the electronic device,

after inputting the security code from the first card, removing said first card from the receptacle,

thereafter inputting data to the electronic device that is utilized in the operation thereof by inserting a second non-volatile memory card into said receptacle on which the data is stored, and

thereafter operating the enabled electronic device with the use of said data.

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11. The method of claim 10, wherein the data inputted to the electronic device include audio data that is utilized by the device to generate sounds.

12. The method of claim 11, wherein the sounds that are generated include music.

13. The method of claim 11, wherein the electronic device includes a sound system installed in a vehicle.

14. The method of claim 10, wherein the electronic device includes a global positioning system and the data inputted to the electronic device includes global positioning data.

15. The method of claim 10, wherein the electronic device includes a portable electronic device and the data inputted to the electronic device include a program for at least in part operating the device.

16. (Amended) An electronic device, comprising:

at least one receptacle into which a first electronic card having a shape and arrangement of contacts of a first published card standard is removably insertable to form an electrical connection between the contacts of the card and the device but wherein a second electronic card having a shape and arrangement of contacts of a second published card standard is not operatively insertable into the receptacle to make said connection, and

wherein the first ~~memory~~ card includes electronic functions and an electrical interface through its said contacts according to the second card standard that are distinct from electronic functions and an electrical interface of the first card standard.

17. The device according to claim 16, wherein the first card standard is that of the MMC or SD Card, while the second card standard is an ISO/IEC 7816 standard.

18. (Amended) The card according to claim 17, wherein the first card omits having ~~the~~ an electrical signal interface at ~~its~~ said contacts according to the first card standard.



19. The card according to claim 18, wherein data of a security code is stored in the first card in a manner to be accessible by the device through the first card contacts according to the electrical interface of the second card standard.

20. (Amended) The card according to claim 17, wherein the first card additionally includes ~~the~~an electrical signal interface at ~~its~~said contacts according to the first card standard.

21. The card according to claim 20, wherein the first card includes data stored therein of a security code that is accessible by the device through the first card contacts according to the electrical interface of the second card standard, and additionally includes content data stored therein that is accessible through the first card contacts according to the electrical interface of the first card standard, wherein the security code is adapted for use in enabling utilization of the content data.

22. (Amended) An electronic device, comprising:  
an electronic system that performs at least one designated function,  
a stored security code,  
~~at least one~~a receptacle into which at least one type of non-volatile memory card is removably insertable,

a circuit connected to said ~~at least one~~ receptacle to receive a security code from a memory card inserted into said ~~at least one~~ receptacle and enable the electronic system to perform said at least one designated function when the received security code matches the stored security code, and

another circuit connected to said ~~at least one~~ receptacle to receive data from a memory card inserted into said ~~at least one~~ receptacle and supply that data to the electronic system for use in the performance of said at least one designated function.

23. (Amended) The electronic device of claim 22, additionally comprising first and second memory cards ~~of said at least one type~~, said first card containing the security code and the second card containing the data.

24. Sound apparatus, comprising:

at least first and second memory cards that each have a given physical format and pattern of electrical contacts from which data stored therein can be read, and

an audio unit for installation in a vehicle, including:

an audio amplifier,

a slot to receive insertion of one of the memory cards at a time and contact the given pattern of electrical contacts of an inserted memory card,

a security circuit that enables operation of the audio unit in response to a specific security code for the radio, and

a card interface circuit connected with the slot to provide a security code to the security circuit and audio data to the audio amplifier according to data contained on a card inserted in the slot,

said first memory card containing security code data to which the security circuit responds and the second memory card containing audio data to which the audio amplifier responds to reproduce sound according to the audio data.

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